

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GEOTAB USA, INC. AND GEOTAB, INC.,
Petitioners,

v.

OMEGA PATENTS, LLC
Patent Owner.

Case IPR2023-00504
Patent 8,032,278

**PATENT OWNER'S OBJECTIONS TO PETITIONERS'
DEMONSTRATIVE EXHIBITS**

Pursuant to the Board's Order Setting Oral Argument (Paper 35), the parties met and conferred regarding Patent Owner's Objections to Petitioners' Demonstrative Exhibits (Ex. 1130, individual pages identified below as "slides") but were unable to resolve the following objections:

Slides 16 and 59

Slides 16 and 59 both declare that "PO'S Misleading Sur-Reply Argument on RX4 (90/014419) Does Not Change Any Patentability Analysis Herein," stating that Omega's characterization of Reexamination 90/014,419 was misleading and does not change the analysis of patentability. This relates to Omega's Third Supplemental Mandatory Notice (Paper 24), which was accurate and not referenced by Petitioner in their Reply to the Institution Decision (filed Jan. 30, 2024), making these arguments both new and factually incorrect, thus violating the "strict prohibition against the presentation of new evidence or arguments at the hearing" (Paper 35, p. 3).

Dated: April 22, 2024

Respectfully submitted,
Omega Patents, LLC

/s/ Ryan T. Santurri

Lead Counsel

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 22, 2024, true and correct copies of the foregoing PATENT OWNER'S OBJECTIONS TO PETITIONER'S DEMONSTRATIVE EXHIBITS were served via electronic mail upon the following counsel for record for Petitioners:

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